

EXHIBIT B

Deposition of
Jason W. Beaman, D.O., M.S., M.P.H., FAPA
September 30, 2021

Dillard
vs.
City of Springdale



Jason W. Beaman, D.O., M.S., M.P.H., FAPA

**Dillard vs.
City of Springdale**

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD, JINGER) Case No.
VUOLO, and JOY DUGGAR) 5:17-CV-05089-TLB
)
Plaintiffs,)
)
vs.)
)
CITY OF SPRINGDALE; WASHINGTON COUNTY;)
KATHY O'KELLEY; ERNEST CATE; RICK HOYT;)
STEVE ZEGA; BAUER PUBLISHING COMPANY,)
L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA)
GROUP, INC.; BAUER, INC; HEINRICH BAUER)
NORTH AMERICA, INC; BAUER MEDIA GROUP)
USA, LLC; and DOES 1-10, inclusive,)
)
Defendants.)
)

DEPOSITION OF JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA
via Zoom videoteleconference
Thursday, September 30, 2021

REPORTED BY: Derek L. Hoagland
CSR No. 13445
Job No. 10089281

Jason W. Beaman, D.O., M.S., M.P.H., FAPA**Dillard vs.
City of Springdale**

IN THE UNITED STATES DISTRICT COURT
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JILL DILLARD, JESSA SEEWALD, JINGER) Case No.
 VUOLO, and JOY DUGGAR) 5:17-CV-05089-TLB

Plaintiffs,

vs.

CITY OF SPRINGDALE; WASHINGTON COUNTY;
 KATHY O'KELLEY; ERNEST CATE; RICK HOYT;
 STEVE ZEGA; BAUER PUBLISHING COMPANY,
 L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA
 GROUP, INC.; BAUER, INC; HEINRICH BAUER
 NORTH AMERICA, INC; BAUER MEDIA GROUP
 USA, LLC; and DOES 1-10, inclusive,

Defendants.

Deposition of JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA,
 taken before Derek L. Hoagland, a Certified Shorthand
 Reporter for the State of California, commencing at
 9:09 a.m., Thursday, September 30, 2021, via Zoom
 videoteleconference.

Jason W. Beaman, D.O., M.S., M.P.H., FAPA**Dillard vs.
City of Springdale**

1 Anxiety Inventory, along with many, many others.

2 **Q. What tests are you competent to perform in**
3 **connection with this psychological assessment?**

4 A. I would say the depression screening
5 instruments, such as the Beck Depression Inventory, the
6 PHQ-9, anxiety instruments, including the Y-BOCS, and
7 the GAD-7, the MMSE, the Inventory of Problems-29, among
8 others. If you had a specific test, I would be happy to
9 tell you whether or not I feel competent in that.

10 **Q. Sure.**

11 **Did you administer any test to any of the**
12 **plaintiffs in this case?**

13 A. I did not.

14 **Q. Did you conduct any interviews of any of the**
15 **plaintiffs in this case?**

16 A. I did not.

17 **Q. Why didn't you perform any tests on any of the**
18 **plaintiffs in this case?**

19 A. Well, so specifically, I was hired and retained
20 by counsel to look at the opinion and formulation
21 procedures and methods used by Dr. Wynne. Since I was
22 evaluating Dr. Wynne's practices, and the interviews he
23 conducted with the complainants were video recorded,
24 then specific to my role, I was not -- it was not
25 necessary for me to interview the defendants -- I'm

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

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1 sorry, the plaintiffs.

2 BY MR. BLEDSOE:

3 Q. Did you conduct any interviews of any of the
4 plaintiffs in this case?

5 A. No.

6 Q. Let's go back to what you said is the purpose
7 that you were retained for. Do you recall talking about
8 that just a minute ago?

9 A. Yes.

10 Q. What were you retained to do in this case?

11 A. To evaluate specifically the psychological
12 opinion of Dr. Wynne related to the defendants -- I'm
13 sorry, the plaintiffs.

14 Q. Were you asked to perform your own evaluation of
15 the psychological issues related to plaintiffs in this
16 case?

17 A. I was not asked to perform an evaluation.

18 Q. So is it true that you were asked to essentially
19 critique Dr. Wynne's opinion in this case? Correct?

20 A. I would say his methods, procedures, evaluation,
21 and opinion.

22 Q. And you were not asked to conduct your own
23 psychological evaluation of plaintiffs in this case,
24 correct?

25 A. That is correct. Not at this time.

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.
City of Springdale

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA) ss.

I, DEREK L. HOAGLAND, CSR #13445, State of California,
do hereby certify:

That prior to being examined, the witness named in the
foregoing proceeding was by me sworn to testify to the
truth, the whole truth and nothing but the truth;

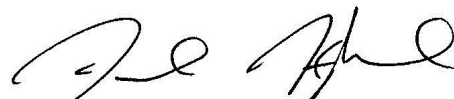
That said proceeding was taken down by me by stenotype
at the time and place therein stated and thereafter
transcribed under my direction into computerized
transcription.

I further certify that I am not of counsel nor attorney
for nor related to the parties hereto, nor am I in any
way interested in the outcome of this action.

Further, that if the foregoing pertains to
the original transcript of a deposition in a federal
case, before completion of the proceedings, review of
the transcript [X] was [] was not requested.

In compliance with section 8016 of the Business and
Professions Code, I certify under penalty of perjury
that I am a certified shorthand reporter with license
number 13445 in full force and effect.

Witness my hand this October 15, 2021.



DEREK L. HOAGLAND, CSR #13445